

Dedrick Lemont Hickey #404004

Full Name/Prisoner Number

201 N. Shartel

Oklahoma City, OK

73102

Complete Mailing Address

Plaintiff

FILED

NOV 09 2020

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DISTRICT OF OKLA.
BY [Signature] DEPUTY

RECEIVED

JUN 25 2020

**ATTORNEY GENERAL
LITIGATION**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF

Dedrick Lemont Hickey 404004:

CIV-20-1134-R

Plaintiff,

(Full name and prisoner number.)

CASE NO. _____

(To be supplied by the Court)

vs. Oklahoma County SHERIFF:

Department

P.D Taylor

Defendant(s),

(Full name(s). Do not use et. al.)

Jail Administrators

Nicole Buens Public Defender

**PRISONER CIVIL RIGHTS
COMPLAINT**

A. PARTIES

1. Dedrick Lemont Hickey is a citizen of Oklahoma
(Plaintiff) (State)

presently residing at 201 N. Shartel Oklahoma City, OK 73102
(Mailing address or place of confinement)

2. Defendant Sheriff's Department is a citizen of Oklahoma
(Name of first defendant) (State)

whose address is 201 N. Shartel Oklahoma City, OK 73102

and who is employed as Oklahoma County Detention Center
(Title and place of employment) Jail Administrators

At the time the claim(s) alleged in this complaint arose, was this defendant acting under color

of state law? ☒ Yes ☐ No. If your answer is "Yes," briefly explain: The
staff at the Oklahoma county
Sheriff's Department had
control of my movements and living
conditions I was in there custody.

3. Defendant P.D Taylor is a citizen of Oklahoma
(Name of second defendant) (State)
 whose address is 201 N. Shartel Oklahoma City, OK 73102
 and who is employed as SHERIFF Oklahoma County Jail
(Title and place of employment)

At the time the claim(s) alleged in this complaint arose, was this defendant acting under color
 of state law? ☒ Yes ☐ No. If your answer is "Yes," briefly explain: Sheriff
P.D Taylor had power and
control over me and I was
a prisoner at his jail.

NOTE: If more space is needed to furnish the above information for additional defendants, continue on a blank sheet which you should label "APPENDIX A. PARTIES." Be sure to include the same information for each defendant including their complete address and title.

B. JURISDICTION

1. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. § 1983 (applies to state prisoners)

☐ *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

2. Jurisdiction also is invoked pursuant to 28 U.S.C. § 1343(a)(3). (If you wish to assert jurisdiction under different under different or additional statutes, you may list them below.)

C. CAUSE OF ACTION

1. I allege that the following of my constitutional rights, privileges, or immunities have been violated: (If more space is needed to explain any allegation or to list additional supporting facts, continue on a blank sheet which you should label "APPENDIX D. CAUSE OF ACTION.")

Access to law library and legal services
like Notary and the grievance process
Cruel and unusual punishment and unsanitary
living conditions like bed bugs, mold on feeding
trays, four or more days of not coming out
of my cell for showers or recreation, Mental anguish.

2. Supporting Facts: (Include all facts you consider important, including names of persons involved, places, and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

While staying in the Oklahoma County Detention
Center I have experienced all of the things
listed above, things like three people in
a two man cell and one us having to
sleep on the floor. I have been in the
Oklahoma County Detention Center since march
of 2018 and I am still here now and
I am still experiencing some of these things.

One of the main things was me being denied law library and library services while going pro se and representing myself from the Detention Center. Without those services it is very difficult to defend yourself pro se. Dates include 7-26-19 all the way up until 8-14-19 then on and off until I requested court appointed attorney. All of which can be proven by review of camera footage at the Detention Center. The cruel and unusual punishment and mental anguish has been going on since I got to the Detention Center in March of 2018. That also can be proven by camera footage at the Jail. All by facility staff. Being refused Showers, then to a cell. Mold on trays and Bed Bugs can be proven right now if you visit the Jail.

D. PREVIOUS LAWSUITS

1. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to the conditions of your imprisonment? Yes ☒ No ☐. If your answer is "Yes," describe each lawsuit. (If there is more than one lawsuit, described the additional lawsuits using this same format on a blank sheet which you should label "APPENDIX E. PREVIOUS LAWSUITS")

a. Parties to previous lawsuit:

Plaintiff(s): Dedrick Lemont Hickey

Defendant(s) The Department of
corrections.

b. Name and location of court and docket (case) number: DONT
KNOW NO ACCESS TO RECORDS

c. Disposition of lawsuit. (For example, was the case dismissed? Was it appealed?

It is still pending?) DONT KNOW
NO ACCESS TO RECORDS

d. Issues raised: I AM NOT SURE. ONCE I WAS
RELEASED I NEVER RECEIVED
FURTHER CORRESPONDENCE ABOUT THE SUIT.

e. Approximate date of filing lawsuit: DONT KNOW NO ACCESS

f. Approximate date of disposition: DONT KNOW NO ACCESS

E. EXHAUSTION OF PRISON OR JAIL GRIEVANCE SYSTEM

1. I have exhausted the grievance system within the jail or prison in which I am incarcerated. ☒ Yes
☐ No. If your answer is "Yes, briefly explain the steps taken to exhaust each claim you are bringing
against each Defendant. It is advisable to attach proof of exhaustion. If your answer is "No," briefly
explain why the grievance system or other administrative remedies were not exhausted.

I have filed Request of staffs and grievances
Some go unanswered some are answered but have
Nothing to do with my issue in the Request or

grievance, everything on the computer
Requests for copies were unanswered.

F. PREVIOUSLY DISMISSED ACTIONS OR APPEALS

1. If you are proceeding under 28 U.S.C. § 1915, please list each civil action or appeal you have brought in a court of the United States, while you were incarcerated or detained in any facility, that was dismissed as frivolous, malicious, or for failure to state a claim upon which relief may be granted. Please describe each civil action or appeal. If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a blank sheet which you should label "APPENDIX F. PREVIOUSLY DISMISSED ACTIONS OR APPEALS."

a. Parties to previous lawsuit:

Plaintiff(s):

Det. Lemont Hickey

Defendant(s):

The Department of
Corrections

b. Name and location of court and docket (case) number:

DON'T
KNOW NO ACCESS TO RECORDS

c. Grounds for dismissal: () frivolous () malicious () failure to state a claim upon which relief may be granted.

d. Approximate date of filing lawsuit:

DON'T KNOW NO ACCESS

e. Approximate date of disposition:

DON'T KNOW NO ACCESS

G. IMMINENT HARM

1. Are you in imminent danger of serious physical injury? ☒ Yes ☐ No. If your answer is "Yes," please describe the facts in detail below without citing legal authority or argument.

Being around gangs, races, and staff that I had

conflicts with in the past. Threats
being made to me by staff and
inmates concerning my safety
and well being.:

H. REQUEST FOR RELIEF

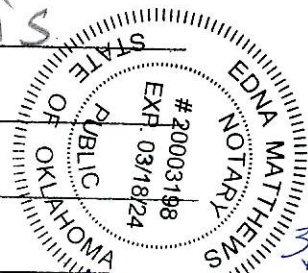
I request the following relief:

Any relief thats available to me
for these offenses to be released
from this facility and financial
Relief for the mental anguish
and pain and suffering also the
Damage to my legal Defense
in the amount \$750,000.

I. Request for Appointment of Attorney

I do ☒ do not ☐ request that an attorney be appointed to represent me in this matter. I believe
that I am in need of an attorney for these particular reasons which make it difficult for me to pursue this
matter without an attorney: I DON'T KNOW

everything about how this
is done or the proper
procedure.



[Signature]
6-3-2020